Filed 12/26/2007

Page Pope J

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

MEIJER, INC. and MEIJER DISTRIBUTION, INC., on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

LG ELECTRONICS, INC.; LP DISPLAYS INTERNATIONAL LTD. f/k/a LG. PHILIPS DISPLAYS; KONINKLIJKE PHILIPS ELECTRONICS N.V. a/k/a ROYAL PHILIPS ELECTRONICS N.V.; PHILIPS ELECTRONICS NORTH AMERICA CORPORATION; MATSUSHITA ELECTRIC INDUSTRIAL CO., LTD.; PANASONIC CORPORATION OF NORTH AMERICA; SAMSUNG ELECTRONICS CO., LTD.; SAMSUNG SDI CO. LTD. f/k/a SAMSUNG DISPLAY DEVICE CO. LTD.; SAMSUNG ELECTRONICS AMERICA, INC.; SAMSUNG SDI AMERICA, INC.; TOSHIBA CORPORATION; TOSHIBA AMERICA ELECTRONICS COMPONENTS, INC.; TOSHIBA AMERICA INFORMATION SYSTEMS, INC.; MATSUSHITA TOSHIBA PICTURE DISPLAY CO., LTD. a/k/a MT PICTURE DISPLAY CO., LTD.; MT PICTURE DISPLAY CORPORATION OF AMERICA (NEW YORK); MT PICTURE DISPLAY CORPORATION OF AMERICA (OHIO); CHUNGHWA PICTURE TUBES, LTD.; and TATUNG COMPANY OF AMERICA, INC.,

Defendants.

July Daniels

Civil Action No.: 07 CV 10674 (UA)

STIPULATION RE EXTENSION OF TIME FOR DEFENDANT TO ANSWER, MOVE, OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT

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WHEREAS Plaintiffs Meijer, Inc. and Meijer Distribution, Inc. ("Plaintiffs") filed a complaint in the above-captioned case on or about November 29, 2007;

WHEREAS Plaintiffs allege antitrust violations by manufacturers, distributors, and sells of cathode-ray tubes and products containing cathode-ray tubes (collectively, "CRT products");

WHEREAS six complaints have been filed to date in federal district courts through the United States by plaintiffs purporting to bring class actions on behalf of direct and indirect purchasers alleging antitrust violations by manufacturers, distributors, and sellers of CRT products (collectively, "the CRT Cases");

WHEREAS a motion is pending before the Judicial Panel on Multidistrict Litigation to transfer the CRT Cases to this jurisdiction for coordinated and consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407, a response to the motion has been filed, and the parties anticipate that additional responses will be filed by Plaintiffs and various defendants;

WHEREAS Plaintiffs anticipate the possibility of a consolidated amended complaint in the CRT Cases;

WHEREAS Plaintiffs and Defendant Philips Electronics North America Corporation ("Philips") have agreed that an orderly schedule for any response to the pleadings in the CRT Cases would be more efficient for the parties and for the Court;

WHEREAS Plaintiffs agree that the deadline for Philips to answer, move, or otherwise respond to the complaint shall be extended until the earliest of the following dates: (1) forty-five days after the filing of a consolidated amended complaint in the CRT Cases; or (2) forty-five days after Plaintiffs provide written notice to Philips that Plaintiffs do not intend to file a consolidated amended complaint, provided, however, that, in the event that Philips should

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agree to an earlier response date in any CRT case, Philips will respond to the complaint in the above-captioned action on that earlier date;

WHEREAS Philips agrees that, if any other steps are taken in any other CRT Case such as the production of documents, the entry of any stipulation to preserve documents or similar activity – Philips will undertake such actions in this case as well;

WHEREAS Plaintiffs further agree that this extension is available, without further stipulation with counsel for Plaintiffs, to all named defendants who notify Plaintiffs in writing of their intention to join this stipulation and abide by its terms as of they were Philips;

WHEREAS this stipulation does not constitute a waiver by Philips of any defense, including, but not limited to, the defenses of lack of personal jurisdiction, subject matter jurisdiction, improper venue, sufficiency of process or service of process; and

WHEREAS with respect to any named defendant joining the stipulation, this stipulation does not constitute a waiver of any defense, including, but not limited to, the defenses of lack of personal jurisdiction, subject matter jurisdiction, improper venue, sufficiency of process or service of process.

THEREFORE, Plaintiffs and defendant Philips, by and through their respective counsel of record, hereby stipulate as follows:

The deadline for Philips to answer, move, or otherwise respond to the complaint shall be extended until the earliest of the following dates: (1) forty-five days after the filing of a consolidated amended complaint in the CRT Cases; or (2) forty-five days after Plaintiffs provide written notice to Philips that Plaintiffs do not intend to file a consolidated amended complaint, provided, however, that, in the event that Philips should agree to an earlier response date in any

CRT Case, Philips will respond to the complaint in the above-captioned action on that earlier date.

- 2. If any other steps are taken in any other CRT Case in which Philips is named as a party – such as the production of documents, the entry of any stipulation to preserve documents or similar activity – Philips will undertake such actions in this case as well.
- 3. This extension is available, without further stipulation with counsel for Plaintiffs, to all named defendants who notify Plaintiffs in writing of their intention to join this stipulation.
- 4. This stipulation does not constitute a waiver by Philips, or any other named defendant joining the stipulation, of any defense, including, but not limited to, the defenses of lack of personal jurisdiction, subject matter jurisdiction, improper venue, sufficiency of process or service of process.

IT IS SO STIPULATED.

Dated: December 19, 2007

Case 1:07-cv-10674-GBD

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America Corporation

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the preceding document was sent, in the manner described below, to the following attorneys on this 20th day of December 2007.

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